



Amoco Oil Company

200 East Randolph Drive Post Office Box 6110-A Chicago, Illinois 60680 Refining & Engineering Department 312-856-5450

J. F. Horner Vice President - Refining & Engineering

November 18, 1980

Regional Administrator EPA Region V RCRA Activities Post Office Box 7861 Chicago, Illinois 60680 Certified Mail, Return Receipt Certification No. P26 2048550

Dear Sir:

Attached, please find the three Part A applications for the permits for hazardous waste management facilities associated with operation of the Amoco Oil Company refinery at Wood River, Illinois. Submission of the attached applications was delayed until today in order to afford the opportunity to obtain the maximum EPA clarification of specific requirements of the applicable regulations.

The regulations issued pursuant to RCRA, namely 40 CFR Parts 122 through 124 and Parts 260 through 265, are complex and subject to different interpretations. These interpretations may change as the U.S. EPA attempts to clarify specific requirements by issuing Regulatory Interpretive Memoranda or through amendment by rule. We were hopeful that these clarifications would be issued by EPA early enough prior to November 19 to allow for incorporation in our application, if necessary. However, this did not occur. The attached interim status permit application, Part A, constitutes a good faith effort by the Standard Oil Company (Indiana) and its Amoco Oil Company subsidiary to comply with these regulations and requirements as we understand them.

However, we reserve the right to supplement, amend, or otherwise modify, the attached interim status application should our original interpretation be found inconsistent with U.S. EPA's interpretation, or subsequent clarifications and amendments by the Agency lead to different interpretations_than incorporated in our application.

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Attachment

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RIVER

VII. SIC CODES (4-digit, in order of priority)	4
A. FIRST	B. SECOND
7 2 8 6 9 (specify) Lube Additive Manufacturing	7 5 1 7 1 (specify) Petroleum Terminaling
C. THIRD	D. FOURTH
(specify)	(specify)
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C. STATUS OF OPERATOR (Enter the appropriate letter into the answ	wer box; if "Other", specify.) D. PHONE (area code & no.)
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(II. NATURE OF BUSINESS (provide a brief description)	
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KIII. CERTIFICATION (see instructions) I certify under penalty of law that I have personally examined and	am familiar with the information submitted in this application and all
attachments and that, based on my inquiry of those persons im- application, I believe that the information is true, accurate and co- false information, including the possibility of fine and imprisonmen	mediately responsible for obtaining the information contained in the omplete I am aware that there are significant penalties for submitting
J. F. Horner, Vice President Refining and Engineering	C. DATE SIGNED
COMMENTS FOR OFFICIAL USE ONLY	

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F. COUNTY CODE (if known)

D. STATE

E. ZIP CODE

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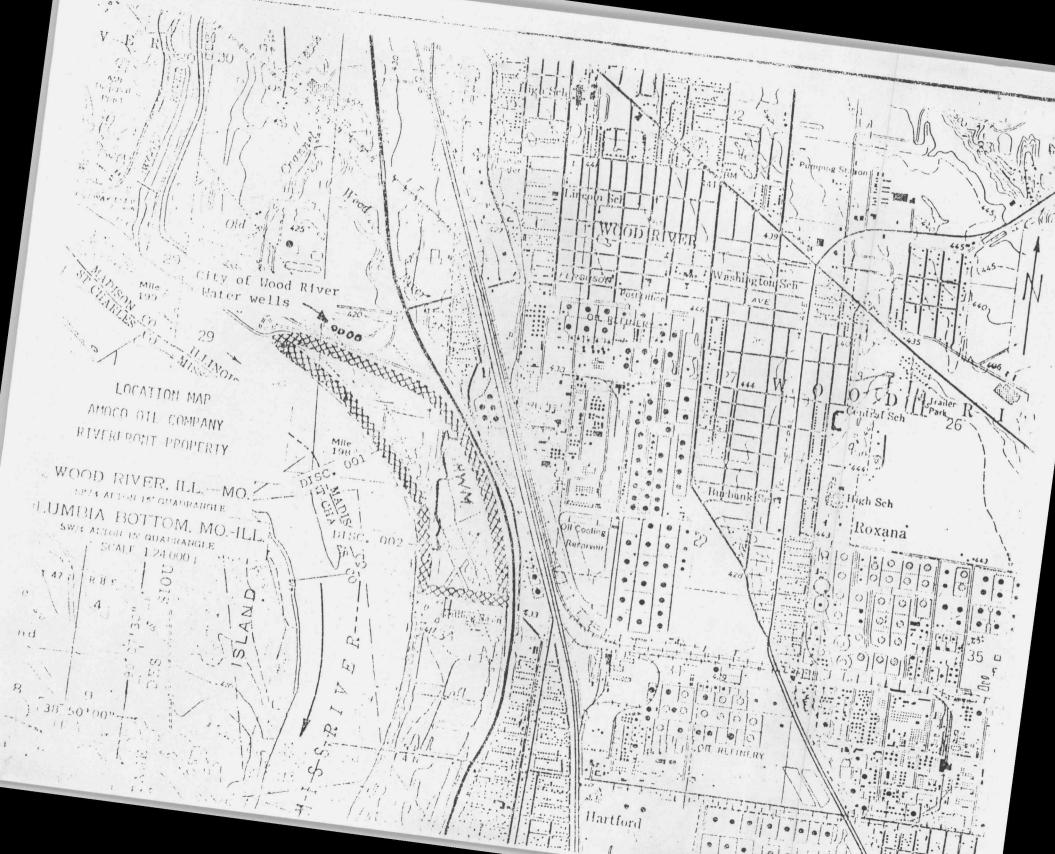
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A. NAME & OFFICIAL TITLE (type or print)	B SIGNATU	HE /	ज़े द	DATE SIGNED
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COMMENTS FOR OFFICIAL USE ONLY				
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ш	PRO	CESSES	(continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

TO4 480,000 U: Chemical stabilization of stored KO48 (DAF float) to render it nonhazardous by test.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE CODI
POUNDS	P	KILOGRAMS,K
TONS	Т	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous weste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three is described above; (2) Enter "000" in the extreme right box of Item (V-D(1)) and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Selectione of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next the enter the other EFA Hazardous Waste Number that can be used to discribe the waste. In column D(2) on that line enter 'included with above" and make no other entries on that line,
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A faculty will treat and dispose of an estimated 900 pounds per year of chrome shavings from leatner tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

l	A. EPA		C.UNIT		D. PROCESSES
LINE NO.	HAZARD. WASTENO. (enter code)	D. COLIMATED ANNOAL	OF MEA- SURE From cer Conden	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	D[0][0][2]	400	P	$T \stackrel{\circ}{\theta} \stackrel{\circ}{\beta} \stackrel{\circ}{D} \stackrel{\circ}{S} \stackrel{\circ}{\theta}$	SEP 12 1984
X-3	$D[\theta]\theta[t]$	100	F	T 0 3 D 8 0	IEPA-DLPC
X-4					included with above

FORM

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HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

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FORM	SEPA

U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program

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e 8	F	ΥR.			OPEF (use t	RATIO	N BEG	G FACILITIES, PROVIDE THE DATE (yr., mo., & day) EGAN OR THE DATE CONSTRUCTION COMMENCED to the left)							& day) ENCED	VR. MO. DAY (Vr., mo., & day) C					OPE:				
1 <u>3</u> В.	RE	VΤŚ	ED	APPLICA	TION (P		an ''X'' below and complete (tem I above)										2. FACILITY		CRA	PERN	11T				
III	7	2		SES – CO				CAPA	CIT	ES	-								7	2					
В.	ente desc PRO 1.	ring ribe DCE AM(co the ss	des. If more process (in DESIGN CANT — Enter	e lines are cluding its PACITY - the amoun	needed s <i>design</i> — For e	l, enter <i>capaci</i> ach co	the codity) in de ente	de(s) the s ered	in ti pace n co	pro lum	pace video	prod d on ente	vide the erth	d. I form	fap m //: pacit	roce <i>em</i> y of	ess /// f th	he process.	t is not include	ed in the lis	t of co	odes b	eiov	v, the
																ie fr	om 1	the	e list of unit mea	sure codes bei	ow that des	cribes	i the u	init (of
measure used. Only the units of measure that are listed below should be used. PRO- APPROPRIATE UNITS OF													PRO-	APPROP	RIAT	E UN	ITS	OF							
			PI	ROCESS			ASURE									ı	PR	OCESS	CESS	MEASUF DESI		OR PR			
S	tora	 -				DESIGN CAPACITY Treatm								Trea	tme		_								
	ON.		NEI	R (barrel, dri		ALLONS OR LITERS SALLONS OR LITERS							TANK					T01	LITERS PER DAY				1		
WASTE PILE S03								C YAR C Met	DS (R					SURFACE IMPOUNDMENT INCINERATOR					T02 GALLONS PER DAY OR LITERS PER DAY					t
	ispo			MPOUNDMI	S04	GALL	.ons c)R L	ITE	RS				INC	INE	RAT	0	R	T03	METRIC T	rons	PER	HOL		
11	1JE	TI	ON	WELL		D79		ONS									/¶ 7_	- 4			LITERS P	ER H	OUR		
1	CE	D AI	PPL DIS	ICATION POSAL		D81 D82	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER surface impoundments or in ators. Describe the processes GALLONS PER DAY OR LITERS PER DAY GALLONS OR LITERS						ccurring in tank adments or incine the processes in	8, er- 1	GALLONS LITERS P			OR							
S	URI	AC	E 11	MPOUNDM	ENT			ONS (OR L	ITE	RS														
	-					MEAS	SURE MEASURE								ASURE	UNIT MEAS									
_				EASURE			DE UNIT OF MEASURE CODE									UNIT OF ME					ODE				
L	ITE	R5		D\$			L TONS PER HOUR								D	ACRE-FEET HECTARE-N	METER				. F				
С	UBI	C M	IEΤ	ERS			ċ		GA	LLO	NS	PER	но	UR						ACRES Hectares				· · ·	. B . Q
EX	AMI	PLE	FC	R COMPLE	TING ITE	M III	(shown	in line	nun	bers	X-1	RHO I and	1 X-	2 be	elow.	<i>i:</i> A	fac	ilit	H ty has two storag	e tanks, one t	ank can hol	d 20 0) gallo	ns ar	nd th
oth	er c	an h	old	400 gallons	. The faci	lity als	O has a	n incin	erato	r tha	et ca	n bu	irn ı	up to	0 20	gaile	ons	ber	r hour.	, , , , , , , , , , , , , , , , , , , 	, , , ,				
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	T	PR	0-	B. Pi	ROCESS		GN CA	PACI	TY		\perp			1	٠,	<u>,</u>	\ PR(\int	B. PROC	ESS DESIG	N CAPAC	ITY		Γ_	ــــــــــــــــــــــــــــــــــــــ
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Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80001 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) WILD DUP 9 8 0 5 W 0 3 0 6 DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA
HAZARD.
ZO WASTENO
(cnter code) B. ESTIMATED ANNUAL QUANTITY OF WASTE 1. PROCESS CODES
(enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) 27 - 29 27 - 29 27 20 27 - 29 36 l K 0 4 8 40,000 Т S 0 4 K 0 4 8 200,000 T T 0 4 S 0 4 3 4 5 6 8 9 10 11 12 13 14 15 16 17 18 19 20 21 RECEIVED 23 SEP 12 1984 24 IEPA-DLPC 25

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EPA Form 3510-3 (6-80)

IV. DESCRIPTION OF HAZARDOUS WASTES	(continued)	DN DACE 2	
E. USE THIS SPACE TO LIST ADDITIONAL F	PROCESS CODES FROM ITEM D(1) C	ON PAGE 3.	•
			,
		,	•
	•		
EPA I.O. NO. water from page 1.			
ET TO THE TOTAL TO THE TERMS			
FILD 980503106 6			
V. FACILITY DRAWING		-	
All existing facilities must include in the space provide	d on page 5 a scale drawing of the facility <i>(se</i>	ee instructions for more detail).	
VI. PHOTOGRAPHS			
All existing facilities must include photographs			sting storage,
treatment and disposal areas; and sites of future	storage, treatment or disposal areas (s	ee instructions for more detail).	•
VII. FACILITY GEOGRAPHIC LOCATION			
LATITUDE (degraes minutes, & sec	onds)	LONGITUDE (degrees, minutes, & se	rconasi
3 8 5 0 0 5 1		0900600	9
VIII. FACILITY OWNER		72 74 75 76 777 - 7	
A. If the facility owner is also the facility operato skip to Section 1X below.	or as listed in Section VIII on Form 1, "Gene		box to the left and
B. If the facility owner is not the facility operato	r as i sted in Section VIII on Form 1, compli	ete ine Tollowing Items	
1 NAME OF F	ACILITY S LEGAL OWNER	2. PHON	ENG area i hai A no i
E AMOCO OIL COMPANY		3 1: 2	8:5-6-5111
3. STREET OR P.O. BOX		55 5 - 56	59 - 31 - 5
	4. CITY OR T		6. ZIP CODE
F 200 EAST RANDOLPH DRIVE	G CHICAGO		6 0 6 0 1
IX. OWNER CERTIFICATION	35, 115, 116	-c st s2 [4	51
I certify under penalty of law that I have person	nally examined and am familiar with th	e information submitted in this a	nd all attached
documents, and that based on my inquiry of the	ose individuals immediately responsible	e for outaining the information, I	believe that the
submitted information is true, accurate, and cor including the possibility of fine and imprisonme	mplete. I am aware that there are signif	licant penalties for submitting fals	e information.
A NAME (position type)			
J. F. Horner, Vice President		C. DATE SIC	NED /
Refining and Engineering	11+ 710	2ac 591	5/84
X, OPERATOR CERTIFICATION	MANUAL PROPERTY.		
		· STAN STAN STAN	
I certify under penalty of law that I have person documents, and that based on my induity of the	rany exammed and am reminar with th Ose individuals immediately responsible	e information submitted in this a e for obtaining the information. I	nd all attuched Delieve that the
submitted information is true, accurate, aird cor	mplete. ا am aware that there are signif	ficant nenalties for submitting fals	ie information,
including the possibility of fine and imprisunme		•	
A NAME (property for pas	B SIGNA XUPPER	C DATE SIC	SNED
H. A. McCandless, Vice President	ヒーニコ しょうかいおこ 一番 に	31.13	. 1
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Manufacturing EPA Form 3510-3 (6-80)	10 MM Chull	11618	CONTINUE ON PAGE

EPA I.D. NUMBER (enter from page 1)						/ '	1				T/AC]							
WI	L	D	9	8	0 5 0 3 1 0 6 1				W			DUP			2 DUP	1/////		
IV.	DES	CF	RIP	TIC	N OF HAZARDOUS WAST				ied/									
A. EPA W HAZARD. B. EST				D.	B. ESTIMATED ANNUAL	O.	C.UNIT OFMEA- SURE									D. PROCESSES		
Z O Z	(c)	nter	code)		QUANTITY OF WASTE	1 6	enter ode)					(enter)				2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)	red in D(1))	
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